

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Orly Zeewy	:	Case No.: 20-11595(AMC)
	:	
Debtor	:	Chapter 13

**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE
AND CLEAR OF LIENS AND ENCUMBRANCES**

NOW INTO COURT COMES, Orly Zeewy, hereinafter referred to as “Debtor”, and brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtor commenced the instant Chapter 13 matter on March 13, 2020 by filing a Voluntary Petition.
2. The Chapter 13 Plan has not yet been confirmed.
3. The subject real property is located at 1405 Greywall Lane, Wynnewood, PA 19096 (hereinafter referred to as “the property”).
4. Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Thomas Lowy, a licensed realtor with Keller Williams Realty Devon-Wayne.
6. On or about May 26, 2020, Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$325,000. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**

7. The Buyers, Asaf Zeeve Erlich and Michal Monselise, are not an insiders of the Debtor and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.
8. From the sale proceeds the Debtor intends to satisfy the mortgage and home equity liens held by PHH Mortgage Services and USAA Federal Savings Bank.
9. The Debtor is desirous of receiving the total exemption in the sum of \$25,150.00 from her portion of the sale proceeds plus any sums remaining after all claims are satisfied.
10. An expedited hearing is humbly requested as the settlement date for the sale of the subject property is scheduled for July 15, 2020

WHEREFORE, Debtor, respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: July 1, 2020

/s/Brad J. Sadek, Esq.

Attorney for Debtor
Sadek and Cooper, LLC.
1315 Walnut Street, #502
Philadelphia, PA 19107
215-545-0008